

## **REMARKS**

### **ADMINISTRATIVE OVERVIEW**

Claims 1-35 were previously presented of which Claims 1 and 18 are independent. All claims are rejected. Applicants respectfully traverse all rejections and request reconsideration and withdrawal of all rejections levied against the pending claims. Applicants further request immediate allowance of the pending claims.

### **NON-STATUTORY OBVIOUSNESS-TYPE DOUBLE PATENTING**

Claims 1-35 are provisionally rejected under nonstatutory obviousness-type double patenting over claims 1-35 of co-pending U.S. Patent Application No. 10/711,646 (“the ‘646 application.”) Applicants respectfully request that the Examiner continue to hold this rejection in abeyance until allowable subject matter is found in one of either the ‘646 application or the present application.

### **REJECTIONS UNDER 35 U.S.C. § 102**

Claims 1-10, 12-28 and 30-35 are rejected under 35 U.S.C. § 102(e) as anticipated by U.S. Patent No. 7,401,114 to Block et al. (“Block.”) Applicants respectfully submit that Claims 1-10, 12-28 and 30-35 as previously presented are patentable over Block.

A cited reference anticipates a claimed invention only when that cited reference discloses each and every limitation of the claimed invention. Block fails to anticipate the claimed invention because Block fails to disclose (1) a first ticket and a second ticket obtained by a first protocol service; (2) maintaining a first connection or second connection responsive to validating the second ticket; and (3) validating the first ticket to re-establish the other of the first connection or the second connection.

#### **I. Block fails to disclose a first ticket and a second ticket obtained by the first protocol service**

Block describes associating a token with a session. Block contemplates initiating a single session when a single token is presented to an authentication manager and does not disclose much less suggest a session that is associated with two tokens. *See Block, col. 8, lines 33-61.* In contrast, the claimed invention describes maintaining a connection of a single session by validating a first ticket and a second ticket. Thus, the claimed invention broadly contemplates a

single session associated with two tickets, while Block contemplates a single session associated with one ticket (e.g. token.) Block therefore does not disclose obtaining a first and second ticket.

*II. Block fails to disclose maintaining a first connection or second connection in response to validating the second ticket*

In Block, a desktop unit (“DTU”) accesses a session-hosting server. When the session-hosting server fails, the system in Block uses backup information to redirect the DTU to a different server. *See* Block, col. 4, lines 41-67. Block never discloses or suggests that a connection between the DTU and a session-hosting server is maintained by validating a token. In Block, token validation merely permits the creation of a session, not the maintenance of a connection. Block further describes maintaining a mapping of tokens to sessions however the mapping is used for nothing more than service management. *See* Block, col. 8, lines 33-61. At no point does Block disclose or suggest that the mapping between a session and a token preserves a connection. Furthermore, as stated above, Block does not describe both a first ticket and a second ticket. For these reasons, Block fails to disclose maintaining a first connection or second connection in response to validating the second ticket.

*III. Block fails to disclose validating the first ticket to re-establish the other of the first connection or the second connection*

As stated above, in Block token validation merely permits the creation of a session. Block never discloses or suggests that validating a token can maintain or re-establish a connection. Block may describe reconnecting a DTU to a new server in response to receiving a tokenR and tokenQ message, however receiving a message is not the same as validating a ticket. *See* Block, col. 13, lines 41-64. At no point does Block disclose or suggest that reconnecting a DTU to a new server is done upon validating a token. Thus, Block fails to disclose validating a first ticket to re-establish a first connection or second connection.

For the above-mentioned reasons, Block fails to disclose or suggest each and every element of Claims 1 and 18 therefore these claims are patentable over Block. Claims 2-10, 12-17, 19-28 and 30-35 depend on and incorporate the limitations of Claims 1 and 18 therefore

Claims 2-10, 12-17, 19-28 and 30-35 are also patentable over Block. Applicants respectfully request that, in light of the above remarks, the Examiner withdraw these rejections.

### **REJECTIONS UNDER 35 U.S.C. § 103**

Claims 11 and 29 are rejected under 35 U.S.C. § 103(a) as unpatentable over U.S. Patent Number 7,089,311 to Devine et al. (“Devine”) in view of U.S. Patent Publication Number 2003/0009571 to Bavadekar (“Bavadekar.”) Applicants respectfully submit that Claims 11 and 29 as previously presented are patentable over any combination of Devine and Bavadekar.

Establishing *prima facie* obviousness of a claimed invention requires that the prior art teach or suggest each claim limitation. In view of the arguments stated above, Applicants respectfully submit that independent Claims 1 and 18 are patentable and in a condition for allowance. Claims 11 and 29 depend on and incorporate the patentable limitations of Claims 1 and 18, therefore Claims 11 and 29 are also patentable and in a condition for allowance. Furthermore, the Examiner previously admitted that Devine does not disclose a first ticket and a second ticket. *See* Office Action mailed November 10, 2009, page 5. Bavadekar is cited merely to address using a first protocol encapsulating a second protocol and a host service using the second protocol to communicate. At no point does Bavadekar teach or suggest a first and second ticket much less maintaining or re-establishing a connection upon validation of a first or second ticket. Thus, like Block, Devine and Bavadekar fail to teach or suggest each and every element of the claimed invention and therefore fail to detract from the patentability of the claimed invention. Applicants therefore respectfully request that the Examiner withdraw this rejection.

### **CONCLUSION**

Applicants contend that each of the Examiner’s rejections has been adequately addressed and that all of the pending claims are in a condition for allowance. Accordingly, Applicants respectfully request reconsideration and withdrawal of all grounds of rejection, and allowance of the pending claims. Should the Examiner feel that a telephone conference with Applicants’ attorney would expedite prosecution of this application; the Examiner is urged to contact the Applicants’ attorney at the telephone number identified below.

Respectfully submitted,  
CHOATE, HALL & STEWART LLP

Date: September 13, 2010

/Kellan D. Ponikiewicz/  
Kellan D. Ponikiewicz  
Registration Number: 59,701

Patent Group  
CHOATE, HALL & STEWART LLP  
Two International Place  
Boston, MA 02110  
Phone: (617) 248-5000  
Fax: (617) 502-5002